

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
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CLERK OF COURT

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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA

Plaintiff,

v.

PETROCELLI ROBERTSON,
Aka "Bible", aka "Juice"

Defendant.

CASE NO. 2:23-cr-00003

JUDGE Waterman

INDICTMENT

18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 924(a)(8)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(C)

FORFEITURE ALLEGATIONS

THE GRAND JURY CHARGES:

COUNT ONE

(Felon in Possession of a Firearm)

1. On or about May 27, 2021, in the Southern District of Ohio, the defendant, **PETROCELLI ROBERTSON, aka Bible, aka Juice**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, specifically: a Kahr Arms model CM9, 9mm caliber pistol, bearing serial number 108390; a Glock model 40GEN4, 10mm caliber pistol, bearing serial number BELY681; a Sig Sauer model P320, 9mm caliber pistol, bearing serial number 58A128272; a Glock model 20GEN4, 10mm caliber pistol, bearing serial number BPMV817; a Glock model 23GEN4, .40 caliber pistol, bearing serial number BHXH270; a Glock model 34GEN4, 9mm caliber pistol, bearing serial number BHL P933; a Glock model 17, 9mm caliber pistol, bearing serial number HSR891; a Romarm model Mini Draco, .762 pistol, bearing serial number PE-4854-2018 ROA;

an Intratec model Tec DC9, 9mm caliber pistol, bearing serial number D082551; a Romarm model Micro Draco, .762 pistol, bearing serial number PMD-22646-20 RO; and an Anderson Manufacturing model AM-15, multi-caliber rifle, bearing serial number 18156661, said firearms having been shipped and transported in interstate or foreign commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

COUNT TWO
(Felon in Possession of a Firearm)

2. On or about November 17, 2022, in the Southern District of Ohio, the defendant, **PETROCELLI ROBERTSON**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, specifically: a Glock model 19GEN4, 9mm caliber pistol, bearing serial number AELK321; a Rexio model RJ38, .38 caliber revolver, bearing serial number 109325; and a Smith and Wesson model 642, .38 caliber revolver, bearing serial number 7D18295, said firearms having been shipped and transported in interstate or foreign commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

COUNT THREE
(Possession with Intent to Distribute Fentanyl, Cocaine Base and Methamphetamine)

3. On or about November 17, 2022, in the Southern District of Ohio, the defendant, **PETROCELLI ROBERTSON**, did knowingly and intentionally possess with intent to distribute:

- a. a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide, commonly referred to as fentanyl, a Schedule II controlled substance;
- b. a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance; and

c. a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION A

4. The allegations of Count One of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

5. Upon conviction of the offense alleged in Count One of this Indictment, the defendant, **PETROCELLI ROBERTSON**, shall forfeit to the United States his interest in any firearm and ammunition involved in or used in such violation, including, but not limited to, the following:

- One Kahr Arms model CM9, 9mm caliber pistol, bearing serial number 108390;
- One Glock model 40GEN4, 10mm caliber pistol, bearing serial number BELY681;
- One Sig Sauer model P320, 9mm caliber pistol, bearing serial number 58A128272;
- One Glock model 20GEN4, 10mm caliber pistol, bearing serial number BPMV817;
- One Glock model 23GEN4, .40 caliber pistol, bearing serial number BHXH270;
- One Glock model 34GEN4, 9mm caliber pistol, bearing serial number BHLP933;
- One Glock model 17, 9mm caliber pistol, bearing serial number HSR891;
- One Romarm model Mini Draco, .762 pistol, bearing serial number PE-4854-2018 ROA;
- One Intratec model Tec DC9, 9mm caliber pistol, bearing serial number D082551;
- One Romarm model Micro Draco, .762 pistol, bearing serial number PMD-22646-20 RO;
- One Anderson Manufacturing model AM-15, multi-caliber rifle, bearing serial number 18156661; and
- All associated ammunition.

Forfeiture pursuant to 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION B

6. The allegations of Count Two of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

7. Upon conviction of the offense alleged in Count Two of this Indictment, the defendant, **PETROCELLI ROBERTSON**, shall forfeit to the United States his interest in any firearm and ammunition involved in or used in such violation, including, but not limited to, the following:

- One Glock model 19GEN4, 9mm caliber pistol, bearing serial number AELK321;
- One Rexio model RJ38, .38 caliber revolver, bearing serial number 109325;
- One Smith and Wesson model 642, .38 caliber revolver, bearing serial number 7D18295; and
- All associated ammunition.

Forfeiture pursuant to 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION C

8. The allegations of Count Three of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 21 U.S.C. § 853(a)(1) and (2).

9. Upon conviction of the offense alleged in Count Three of this Indictment, the defendant, **PETROCELLI ROBERTSON**, shall forfeit to the United States all right, title and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s), and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation(s), including, but not limited to, the following:

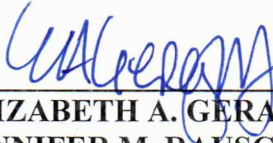
- One Glock model 19GEN4, 9mm caliber pistol, bearing serial number AELK321;
- One Rexio model RJ38, .38 caliber revolver, bearing serial number 109325;
- One Smith and Wesson model 642, .38 caliber revolver, bearing serial number 7D18295; and
- All associated ammunition.

Forfeiture pursuant to 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/Foreperson
FOREPERSON

KENNETH L. PARKER
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